

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Case No. 23-20135 JAD
	:	
Amanda D. Thompson f/k/a Amanda D.	:	Chapter 13
Prinkey, f/k/a Amanda D. Smith, a/k/a	:	
Amanda D. Boyle,	:	Document No.
	:	
Debtor,	:	Related to Document No.
	:	
Pennymac Loan Services, LLC,	:	
	:	
Movant,	:	
	:	
vs.	:	
	:	
Amanda D. Thompson f/k/a Amanda D.	:	
Prinkey, f/k/a Amanda D. Smith, a/k/a	:	
Amanda D. Boyle, and Ronda J.	:	
Winnecour, Chapter 13 Trustee,	:	
	:	
Respondents.	:	

**DEBTORS' RESPONSE TO MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

Debtor, Amanda D. Thompson, by her attorneys Zebley Mehalov & White, and Daniel R. White, Esquire responds to the Motion for Relief from the Automatic Stay as follows:

1-3, 9-13.	Admitted.
4-8, 14-16.	Denied. Debtor demands strict proof of the averments of paragraphs 4-8 and 14-16.

**DEBTORS' DEFENSES**

1. Debtor has a confirmed Chapter 13 plan dated February 14, 2023, which pays Movant its regular monthly payment and cures pre-petition arrears.
2. Debtor is behind with her Chapter 13 plan payments due to her incarceration in the Washington County jail since June 2023. Debtor has hearings at the end of August which will determine if she will remain in jail and if so, the length of her incarceration.

3. Debtor valued her residence at \$80,000.00 in her Schedule A subject to a Movant's mortgage claim in the amount of \$72,702.64 according to Movant's Motion.
4. Movant does not dispute the current market value of the residence as set forth in Debtor's Schedule A.
5. Debtor believes that the pre-petition value of her residence has remained or increased slightly since the filing of her schedules and exceeds the amount of the debt owed to Movant, thus providing adequate protection.
6. Counsel has been in contact with Debtor's mother who has regular conversations with Debtor. Debtor's mother has committed to assist Debtor with her monthly plan payments until she is released from prison starting in September 2023. Debtor believes that her employment will be available immediately upon her release.
7. Under these circumstances, Movant is provided adequate protection and is not entitled to relief from stay as requested.

WHEREFORE, The Debtor, Amanda D. Thompson, respectfully request this Court to Deny the Motion for Relief from the Automatic Stay and Order such further relief that this Court deems appropriate.

Dated: August 18, 2023

ZEBLEY MEHALOV & WHITE, P.C.

By

/s/ Daniel R. White

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